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*Please reply to Southern California***VIA FEDERAL EXPRESS**

October 5, 2007

Ms. Linda Ketellapper, SFD-7-5  
U.S. Environmental Protection Agency  
Superfund Division  
75 Hawthorne Street  
San Francisco, CA 94105

**Re: 104(e) Request for Information - Omega Superfund Site  
Real Property at 8915 Sorensen Avenue, Santa Fe Springs, CA**

Dear Ms. Ketellapper:

This letter is in response to your August 9, 2007 letter's<sup>1</sup> request<sup>2</sup> for information from our client's Robert O. Berg and Donna M. Berg, Pearl Rosenthal and the Estate of Arnold Rosenthal (the EPA referred to the Estate of Arnold Rosenthal as "The Rosenthal Family Trust<sup>3</sup>") (collectively "Bergs and Rosenthals") regarding the Omega Superfund Site and Real Property located at 8915 Sorensen Avenue in Santa Fe Springs, California. As you are aware, this office represents the Bergs and Rosenthals in ongoing litigation (commonly referred to as the Angeles v. McKesson litigation) involving the 8915 Sorensen Avenue property.

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<sup>1</sup>The EPA addressed three separate letters to: (1) Robert O. Berg and Donna M. Berg, (2) Pearl Rosenthal, and (3) Pearl Rosenthal, Trustee The Rosenthal Family Trust Dated June 3, 1989. We respond in one letter on behalf of all respondents, Robert Berg, Donna Berg, Pearl Rosenthal, and the Estate of Arnold Rosenthal (referred to by the EPA as "The Rosenthal Family Trust").

<sup>2</sup>The EPA's request required a written response within 30 days of receipt of this letter. However, on September 5, 2007 you graciously granted our clients request for a 30-day extension to respond.

<sup>3</sup>In the letter you name Pearl Rosenthal as Trustee, however Pearl Rosenthal is not the trustee of the Estate of Arnold Rosenthal. Mark Mordoh is acting trustee of the Estate of Arnold Rosenthal.

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Angeles Chemical Company, Inc. ("Angeles") is currently subject to a February 1993 Department of Toxic Substances Control ("DTSC") Imminent or Substantial Endangerment Order. Currently, all on-site characterization of the groundwater and soil of the Angeles site has been completed at the direction of the DTSC. Greve Financial Services, Inc. ("Greve") the current owner of the Angeles site, is operating a Soil Vapor Extraction ("SVE") in a cyclical fashion. Currently there is also a proposal to have air sparging done on the shallow groundwater on the Angeles site. This proposal has not been approved by the DTSC yet.

In light of the millions of documents produced in the Angeles v. McKesson litigation, it is the understanding of the Bergs and Rosenthals that the U.S. EPA has already obtained a copy of the DTSC file for the Angeles site. In addition, the Bergs and Rosenthals are aware that counsel for Angeles provided the EPA with various documents by various governmental agencies that have been produced in the Angeles v. McKesson litigation. However, should the EPA desire, it may seek a review of all such documents upon the appropriate request.

In addition, the Bergs and Rosenthals provided in their October 2, 2006 letter to the EPA, similar responsive documents regarding "agreements and/or orders between the [Bergs and Rosenthals] and other parties related to the [Bergs and Rosenthals] facility and on-going activities and obligations."

The Bergs and Rosenthals are providing the Environmental Protection Agency with this requested information based upon the best of their knowledge and belief and reserve the right to supplement their responses should additional information become available in the future.

Should you have any additional questions or request any further information, please do not hesitate to contact me. Thank you.

Very truly yours,

THE LAW OFFICES OF  
TIMOTHY C. CRONIN, ESQ.



CHRIS C. CHAPMAN, ESQ.

/ccc

Enclosures

## PRIMARY CONTACT DESIGNATION FORM

**Robert Berg and Donna Berg**

**PLEASE COMPLETE AND RETURN THIS FORM WITHIN THIRTY CALENDAR DAYS OF RECEIPT**

Please complete this form by printing or typing the requested information. If any of the information provided on this form changes after submission of the form including, but not limited to, changes in corporate relationships, please notify EPA at the address listed below as soon as possible. Thank you for your cooperation.

**1. Please provide the following information** for the single person who will be the above-named company's or individual's contact for all future communications (including correspondence, informational mailings, etc.) from EPA regarding Omega. You may designate a legal or other representative as the single primary contact. Please enter "N/A" if the requested information is not applicable to you.

Company/Organization/Individual Name: (only if different from above):	
Name of Designated Contact :	Tim Cronin      Contact's Title: Attorney
Contact's Firm Name:	The Law Offices of Timothy C. Cronin, Esq.
Street Address (no P.O. Box):	202 Fashion Ln Suite 208
City, State & Zip:	Tustin, CA 92780
Telephone Number:	714-505-9365      Fax Number: 714-505-3792
E-mail Address:	tcronin@crolaw.com
Web-site Address:	
<b>2. Other information:</b> Law/Consulting Firm Name (if applicable):	The Law Offices of Timothy C. Cronin, Esq.

**3. Printed Name and Signature of Person Completing This Form**

<u>Chris C. Chapman</u>	<u>Attorney</u>	<u>Cronin Law Offices</u>
Printed Name	Title	Company/Organization
<u>[Signature]</u>		<u>10-5-07</u>
Signature		Date

**4. Please return this form to:**

Linda Ketellapper, Case Developer  
Mail Code SFD-7-5  
U.S. Environmental Protection Agency  
75 Hawthorne St.  
San Francisco, CA 94105

# PRIMARY CONTACT DESIGNATION FORM

Pearl Rosenthal


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Company/Organization/Individual Name: (only if different from above):	
Name of Designated Contact :	Tim Cronin Contact's Title: Attorney
Contact's Firm Name:	The Law Offices of Timothy C. Cronin, Esq.
Street Address (no P.O. Box):	202 Fashion Ln Suite 208
City, State & Zip:	Tustin, Ct 92780
Telephone Number:	714-505-9365 Fax Number: 714-505-3792
E-mail Address:	tcronin@colaw.com
Web-site Address:	
2. Other information: Law/Consulting Firm Name (if applicable):	The Law Offices of Timothy C. Cronin, Esq.

### 3. Printed Name and Signature of Person Completing This Form

Chris C. Chapman	Attorney	Cronin Law Offices
Printed Name	Title	Company/Organization
		10-5-07
Signature		Date

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Mail Code SFD-7-5  
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San Francisco, CA 94105

## PRIMARY CONTACT DESIGNATION FORM

The Rosenthal Family Trust Dated June 3, 1989


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Company/Organization/Individual Name: (only if different from above):	The Estate of Arnold Rosenthal	
Name of Designated Contact :	Tim Cronin	Contact's Title: Attorney
Contact's Firm Name:	The Law Offices of Timothy C. Cronin, Esq.	
Street Address (no P.O. Box):	202 Fashion Ln Suite 208	
City, State & Zip:	Tustin, CA 92780	
Telephone Number:	714-505-9365	Fax Number: 714-505-3292
E-mail Address:	tcronin@ecolaw.com	
Web-site Address:		
2. Other information: Law/Consulting Firm Name (if applicable):	The Law Offices of Timothy C. Cronin, Esq.	

### 3. Printed Name and Signature of Person Completing This Form

Chris C. Chapman	Attorney	Cronin Law Offices
Printed Name	Title	Company/Organization
		10-5-07
Signature		Date

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